1	Luke Busby, Esq.	
2	Nevada State Bar No. 10319 321 S. Arlington Ave.	
3	Reno, NV 89509 775-453-0112	
4	luke@lukeandrewbusbyltd.com Attorney for Plaintiff	
5		ATEC DICTRICT COURT
6	UNITED STATES DISTRICT COU	
7	DISTR	RICT OF NEVADA
8	JSB, a minor, by his parents and natural	
9	guardians MARINA DIAZ and	Case No. 3:14-CV-00436
		STIPULATED DISCO
9	guardians MARINA DIAZ and	
9	guardians MARINA DIAZ and JOSE DIAZ.	STIPULATED DISCO

Case No. 3:14-CV-00436-LRH-WGC

STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER

SUBMITTED IN COMPLIANCE WITH LR 26 1(E)

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

CARSON CITY DEPUTY SHERIFF HARRY W. WHEELER,

Defendant,

Pursuant to the requirements of Fed. R. Civ. P. 26(f) and LR 26-1(e), Plaintiff and Defendant hereby submit the following Stipulated Discovery Plan and Scheduling Order in the

above-referenced matter.

A. Information Requested by Fed. R. Civ. P. 26(f):

- 1. Counsel for the parties conducted a meeting pursuant to Federal Rule of Civil Procedure 26 and Local Rule 26-1(d) on September 23, 2014. Pursuant to an agreement between the parties, the parties will serve initial disclosures in accordance with Federal Rule of Civil Procedure 26(a) on or before Tuesday, October 7, 2014.
- 2. Discovery may be conducted on all discoverable matters relevant to issues raised by the Complaint (and amendments thereto), Answer, and any subsequent pleadings, consistent with the Federal Rules of Civil Procedure and the Local Rules of this District.
 - 3. No changes in limitations, other than those set forth below, set by either the

JSB v. Wheeler: Page -1-

Federal Rules of Civil Procedure or Local Rules for the District of Nevada are requested at this time.

B. Information Requested by LR 26-1(e):

1. Discovery Cut-Off Date:

Discovery will not take more than one hundred eighty (180) days from September 8, 2014 which is the date of the filing of Defendant's Answer to Plaintiff's Complaint. All discovery must be completed no later than **March 8, 2015**. When producing documents responsive to a discovery request, the documents shall be numbered and the responsive documents shall be specifically referred to by bates-number in the response.

2. Amending the Pleadings and Adding Parties:

The date for filing motions to amend the pleadings or to add parties shall not be later than ninety (90) days prior to the discovery cut-off date and, therefore, not later than **December 8**, **2014**. Any party causing additional parties to be joined or brought to this action shall contemporaneously therewith cause a copy of this Order to be served upon the new party or parties.

3. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):

The last day for disclosures required by Fed. R. Civ. P. 26(a)(2) concerning experts shall be **January 7, 2015**. The last day for disclosures regarding rebuttal experts shall be **February 6, 2015**.

4. Dispositive Motions:

The parties shall file dispositive motions not more than thirty (30) days after the discovery cut-off date and, therefore, not later than **April 7, 2015**.

5. Pretrial Order:

If no dispositive motions are filed, and unless otherwise ordered by this Court, the Joint Pretrial Order shall be filed not more than thirty (30) days after the date set for filing dispositive motions and, therefore, not later than **May 7, 2015**. In the event dispositive motions are filed, the last day to file the Joint Pretrial Order shall be suspended until thirty (30) days after the ruling on the dispositive motions.

6. Interim Status Reports:

In accordance with Local Rule 26-3, an Interim Status Report will be filed by the parties JSB v. Wheeler: Page -2-

1	with the Court sixty (60) days prior to the discovery cut-off date, and therefore, not later than		
2	January 7, 2015.		
3	C. Additional Deadlines:		
4	1. Extensions or Modifications of the Discovery Plan and Scheduling		
5	Order:		
6	In accordance with Local Rule 26-4, a stipulation or motion for modification or extension		
7	of this discovery plan and scheduling order must be made no later than twenty-one (21) days prior		
8	to the discovery cut-off date, and therefore, not later than February 16, 2015.		
9	Respectfully submitted this October 7th, 2014:		
10			
11	11 /s/	s/	
12	Luke Busby, Esq. Katherine F. l 321 S. Arlington Ave. 6590 S. McCa	Parks, Esq. rran Blvd. Suite B.	
13	Reno, NV 89509 Reno, NV 895 Attorney for Plaintiff Attorney for the	509	
14	14	J	
15	15		
16	IT IS SO ORDERED		
17	Dated: October 8, 2014.		
	18 William	2 666	
		TES MAGISTRATE JUDGE	
	21		
	22		
	23		
	24		
	25		
	26		
	27		
	28		

JSB v. Wheeler: Page -3-